

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|----------------------------|---------------------------|
| In Re: | § Case No. 19-33168-H1-13 |
| | § |
| Jeffery Robles Soto | § |
| | § |
| | § |
| Debtor(s) | § Chapter 13 |

EXPEDITED EX PARTE MOTION TO SELL EXEMPT REAL PROPERTY

The Debtor(s) request an order on a expedited basis pursuant to paragraph 19 of the plan in this case confirming the Debtor(s)' authority to sell exempt property.

Property: The property to be sold is described on Exhibit "A".

Exemption: The Property, or the Debtor(s)' interest in the Property, was claimed as exempt on Schedule "C", filed at ECF No. 17. The exemptions have been allowed.

Purchaser: Jason and Maria A. Louvier.

Relationship between Purchaser and Debtor(s): None.

Sales Price: 218,300.00.

The Debtor(s) represent that the Sales Price represents the fair market value of the Property.

A copy of the contract providing for the sale of the Property is attached as Exhibit "B".

The Debtor(s) acknowledge that within 14 days following the closing of any sale, the Debtor(s) must provide to the Chapter 13 Trustee a copy of the final closing statement. Any non-exempt proceeds received from the sale must be paid to the Trustee. Unless the sale was privately closed, the closing statement must be the statement issued by the title company or closing agent handling the sale. If the Property was exempted as a homestead solely under Texas law, any proceeds of the sale that are not reinvested in a qualifying Texas homestead within 6 months of the closing of the sale must be paid to the Trustee within 14 days after the expiration of the 6-month period. If only a portion of the proceeds are reinvested in a qualifying Texas homestead prior to the expiration of the 6-month period, the balance of the proceeds must be paid to the Trustee within 14 days of the closing.

The Debtor(s) requests expedited consideration of this Motion due a pending sale. The contract provides for a closing date of 6/25/2019 but the Debtor(s) expects to close

within the next 10 days.

Respectfully submitted,

GUZMAN LAW FIRM

/s/ Mayur M. Patel

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